

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MICHELLE E. LATTIMER,)
Plaintiff,)
v.) Civil Action No. 05-cv-11072-RCL
HALLMARK HEALTH SYSTEM, INC.,)
Defendant.)

)

**UNOPPOSED MOTION FOR EXTENSION
OF TIME TO RESPOND TO COMPLAINT**

The Defendant, Hallmark Health System, Inc., hereby moves for a two week extension of the time in which it has to respond to the Plaintiff's Complaint in this matter, up to and including Tuesday, June 28, 2005. In support of this motion, the Defendant states as follows:

1. The Defendant requires the brief extension of time sought in order to properly investigate the factual and legal issues raised in the Complaint and to prepare an appropriate response thereto.

2. This is the first request for an extension of time filed by the Defendant with regard to the deadline for responding to the Complaint.

3. Plaintiff's counsel, Pamela J. Coveney, Esq., has been contacted regarding this Motion and has indicated that the Plaintiff does not oppose it.

WHEREFORE, the Defendant respectfully requests that the deadline for filing its response to the Complaint be extended up to and including Tuesday, June 28, 2005.

Respectfully submitted,

HALLMARK HEALTH SYSTEM, INC.

By its attorneys,

s/John M. Simon

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Dated: June 13, 2005

Local Rule 7.1(A)(2) Certification

I hereby certify that, pursuant to Local Rule 7.1(A)(2), I have conferred with Plaintiff's counsel in a good faith attempt to resolve or narrow the issue addressed in this Motion and that Plaintiff's counsel has indicated that the Plaintiff does not oppose it.

s/John M. Simon

John M. Simon